

**BELDOCK LEVINE & HOFFMAN LLP**  
**99 PARK AVENUE, PH/26<sup>TH</sup> FLOOR**  
**NEW YORK, N.Y. 10016**

JONATHAN MOORE  
DAVID B. RANKIN  
LUNA DROUBI  
MARC A. CANNAN  
CYNTHIA ROLLINGS  
JONATHAN K. POLLACK  
HENRY A. DLUGACZ  
STEPHEN J. BLUMERT  
MYRON BELDOCK (1929-2016)  
LAWRENCE S. LEVINE (1934-2004)  
ELLIOT L. HOFFMAN (1929-2016)

TEL: (212) 490-0400  
FAX: (212) 277-5880  
WEBSITE: blhny.com

COUNSEL  
BRUCE E. TRAUNER  
PETER S. MATORIN  
KAREN L. DIPPOLD  
MARJORY D. FIELDS  
EMILY JANE GOODMAN  
JUSTICE NYS SUPREME COURT, RET.  
FRANK HANDELMAN

REF: **8289.093**

WRITER'S DIRECT CONTACT:  
212-277-5883  
jkinkle@blhny.com

November 27, 2023

**VIA ECF**

The Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Reclaim the Records and Alec Ferretti v. United States Department of State*, No. 23 Civ. 1471 (JMF)**

Your Honor:

I am an attorney at Beldock Levine & Hoffman LLP, one of the attorneys representing Plaintiffs in the above-referenced action brought pursuant to the Freedom of Information Act ("FOIA"). On behalf of Plaintiffs, I write to respectfully request a two-week extension of the December 8, 2023 deadline for Plaintiffs to respond to Defendant's motion for summary judgment. Under the revised briefing schedule, Plaintiffs' opposition brief would be due December 22, 2023 and Defendant's reply, if any, would be due on January 22, 2024.

This is the first request by Plaintiffs for an extension of the briefing schedule, which is necessary due to the trial commitments in another matter of our lead counsel, David Rankin, and my own unanticipated need to extend my parental leave. Defendant consents to this request.

We thank the Court for its attention to this matter.

BELDOCK LEVINE & HOFFMAN LLP

Hon. Jesse M. Furman

November 27, 2023

Page 2

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jeff Kinkle", written in a cursive style.

Jeffrey F. Kinkle

cc: Defendant's counsel (by ECF)